

HHS/ED COMM #2  
March 20, 2014  
**Briefing**

**MEMORANDUM**

March 19, 2014

TO: Health and Human Services Committee  
Education Committee

FROM: Vivian Yao, Legislative Analyst 

SUBJECT: **Discussion – MCPS Food and Nutrition Policy**

The Health and Human Services (HHS) and Education Committees will discuss food policy issues for Montgomery County Public Schools (MCPS).

The following individuals are expected to participate in the discussion:

- Joshua Starr, Superintendent, MCPS
- Patricia O'Neill, Vice President, Montgomery County Board of Education
- Shirley Brandman, Montgomery County Board of Education member
- Marla Caplon, Director, Division of Food and Nutrition Services (DFNS), MCPS
- Lindsey Parsons, co-founder, Real Food for Kids-Montgomery (RFKM)
- Karen Devitt, co-founder, RFKM

The Committees scheduled this discussion in response to recommendations regarding MCPS food policies transmitted to the County Council by representatives from the local advocacy group Real Food for Kids-Montgomery. See ©1. In correspondence sent March 10 (©2-4), the Chairs of the Health and Human Services and Education Committees transmitted the RFKM recommendations to Superintendent Starr and invited MCPS dialogue on efforts to improve student health and nutrition.

Subsequent to the Committees' letter to the Superintendent, RFKM transmitted its proposed list of banned additives for MCPS Food (©5-10) as well as two tables compiled by RFKM that list "Chemical Additives in MCPS Food Items" (©11) and "Sugar Content in MCPS Food Items" (©12). RFKM explained that the information was compiled from scanned product information sheets from DFNS, and from samples purchased in one middle school cafeteria. The RFKM representative believed that the tables provide substantial representation of what is being served to students; however, the Committees may want to seek comment from MCPS representatives about the information provided.

In his March 14 response to the HHS and Education Committee Chairs (©13-18), the Superintendent expressed his commitment and that of the Board of Education to "a comprehensive approach that supports a healthy school environment and to improving programs that address the latest health and nutrition findings." The following highlights are included in the March 14 letter:

- **Upcoming Board of Education Discussion:** The Board will discuss the school meals program and review the RFKM recommendations, including the cost of making any changes to the program, at the June 3, 2014 Board meeting.
- **Re-forming MCPS Wellness Committee:** MCPS plans to reconvene a Wellness Committee consistent with the Board's policy setting authority and process and final USDA regulations for the Healthy Hunger-Free Kids Act of 2010.
- **Free, Unlimited Water:** Availability of drinking water where meals are served is required by the Richard B. Russell National School Lunch Act. Students are able to access drinking fountains or are provided with cups and water containers in the dining area. All water fountains in areas adjacent to or in the cafeteria are approved for safe drinking.
- **Scratch-Cooked Food:** Meals served by DFNS exceed USDA guidelines and are intended to be acceptable and affordable to a diverse student population. Many items prepared in the Central Production Facility are made from scratch. School kitchens do not have the capacity to fully prepare menu items from scratch, and labor and food costs are prohibitive and could not be recovered through meal price.
- **Dangerous Chemical Additives:** All foods and beverages available to MCPS students are consistent with Food and Drug Administration regulations for food additives. Specifications for food and beverage purchases limit food additives and colorings when appropriate, and DFNS staff collaborates with food manufacturers to expand the availability of products limiting additives.
- **Sugar:** Sugar is limited in the recipes for food items prepared at the Central Production Facility. MCPS limits the sugar content in foods and beverages sold to students throughout the school day and is in compliance with the recommendations of the American Heart Association.
- **Vending and A La Carte (Snack) Offerings:** Foods and beverages available in vending machines and a la carte choices in school cafeterias comply with MCPS Regulation JPG-RA, *Wellness: Physical and Nutritional Health* with guidelines on portion size, calories, percent calories from sugar, and fat and sodium content. Purchases of non-compliant items from vending machines are not available until 30 minutes after the end of the school day.

- **Transparency and Communication:** The published menu informs parents about entrée choices and the availability of alternative and a la carte items. Parents are informed that student accounts may be blocked from making a la carte purchases. The variance of products available at each school prohibits posting a school-specific list on the menu or the DFNS website. Nutrition and allergen information for foods and beverages available through the school cafeteria can be accessed at [www.montgomeryschoolsmd.org/departments/foodserv](http://www.montgomeryschoolsmd.org/departments/foodserv).
- **Unlimited Fruit and Vegetables:** Salad bars are available in many schools, and all school serving lines offer a variety of fresh fruit and vegetables. Permitting students to take unlimited quantities of fruits and vegetables would inhibit compliance with caloric requirements of the Healthy Hunger-Free Kids Act of 2010 and does not encourage balance meals with appropriate serving sizes.

The Committees may be interested in discussing with meeting participants recent efforts to support a "healthy school environment" and to improve "programs that address the latest health and nutrition findings." What are plans in the near future to continue this work? What opportunities for improvement in food and nutrition service identified by RFKM will MCPS be exploring?

## Montgomery County Council Resolution on MCPS Food Suggested Language

In support of the MCPS Strategic Plan (<https://www.montgomeryschoolsmd.org/framework/>) that seeks to have MCPS students "Make constructive and healthy decisions that promote hope, personal well-being, and social behavior", we recommend the following actions by the Montgomery County Board of Education.

**WELLNESS COMMITTEE.** The MCPS Wellness Committee should be re-formed and should include all major stakeholders, including representatives from local community and non-profit organizations that work on issues related to school wellness. The committee should be composed at minimum of 50% parents, selected through an unbiased application process with representation from each cluster and meet at least quarterly. The staff member charged with operational oversight over the formation and implementation of the wellness policy and committee should neither be subordinate to nor an employee of any department or employee responsible for implementation of the policy. The committee should be chaired by a member of the Board of Education.

MCPS should amend its wellness policy to include the following changes:

**FREE, UNLIMITED WATER.** MCPS should implement a system-wide solution for easier access to free, unlimited water in cafeterias (involving something to drink it with other than multiple trips to the water fountain).

**SCRATCH-COOKED FOOD.** MCPS should immediately begin the process of moving from processed, pre-plated and reheated food to food cooked from scratch at the central facility with more prep work done on site at schools with kitchens. At least one meal per day should be offered that is not a typical "junk food" (i.e., not chicken nuggets, pizza, hot dogs, burgers, fries) with an eye toward drastically reducing these options to no more than once or twice a month.

**DANGEROUS CHEMICAL ADDITIVES.** MCPS should remove all chemicals listed as "caution" or "avoid" by the Center for Science in the Public Interest from all food served in MCPS.

**SUGAR.** MCPS should set an upper limit for sugar in any product served in MCPS based on limits for children recommended by the American Heart Association.

**VENDING AND A LA CARTE (SNACK) OFFERINGS.** MCPS should replace items on current vending and a la carte list of foods and beverages with healthier choices (i.e., items without artificial colors and flavors, low in sugar, high in fiber.)

**TRANSPARENCY AND COMMUNICATION.** All items sold and served to children in any school in MCPS' cafeterias or snack carts or shops should appear on the monthly menus. In addition, at the beginning of each school year, each school should send parents a list of a la carte items sold at that school with information on how to block children's lunch accounts to prevent a la carte purchases.

**UNLIMITED FRUITS, VEGETABLES OR SALAD BARS.** MCPS should offer unlimited fruits and vegetables free to all children who purchase lunch, preferably in some type of self-serve bar format. Fruits and vegetables should be in a form that is age-appropriate and easy to eat (i.e., oranges should be peeled and apples should be sliced for elementary-age children).



MONTGOMERY COUNTY COUNCIL  
ROCKVILLE, MARYLAND

March 10, 2014

Joshua Starr, Superintendent  
Montgomery County Public Schools  
850 Hungerford Drive, Room 122  
Rockville, Maryland 20850

Dear Dr. Starr: *Josh,*

As you may know, we have been working constructively with Real Foods for Kids, a 501(c)3 non-profit organization that is committed to educating children and adults about the importance of healthy eating and school food nutrition. In support of the MCPS Strategic Plan that seeks to have MCPS students, "make constructive and healthy decisions that promote hope, personal well-being, and social behavior," they have recommended the following actions by the Montgomery County Board of Education:

**The MCPS Wellness Committee** should be reconstituted and should include all major stakeholders, including representatives from local community and non-profit organizations that work on issues related to school wellness.

**Unlimited Free Water:** MCPS should implement a system-wide solution for easier access to free, unlimited water in cafeterias (involving something to drink it with other than multiple trips to the water fountain). We would also like a list of those schools where students are discouraged from drinking from water fountains because of outmoded plumbing or other hazards.

**Scratch-cooked Food:** At least one meal per day should be offered that is not a typical "junk food" (i.e., not chicken nuggets, pizza, hot dogs, burgers, fries) with an eye toward drastically reducing these options to no more than once or twice a month.

**Dangerous Chemical Additives:** MCPS should remove all chemicals listed as "caution" or "avoid" by the Center for Science in the Public Interest (CSPI) from all food served in MCPS. CSPI's list is attached to this letter.

**Sugar:** MCPS should set an upper limit for sugar in any product served in MCPS based on limits for children recommended by the American Heart Association.

**Vending and A La Carte Offerings:** MCPS should replace items on current vending and a la carte list of foods and beverages with healthier choices (i.e., items without artificial colors and flavors, low in sugar, high in fiber.)

**Transparency and Communications:** All items sold and served to children in any school in MCPS' cafeterias, snack carts or shops should appear on the monthly menus. In addition, at the beginning of each school year, each school should send parents a list of a la carte items sold at that school with information on how to block children's lunch accounts to prevent a la carte purchases.

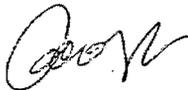
**Unlimited Fruits, Vegetables or Salad Bars:** MCPS should offer unlimited fruits and vegetables free to all children who purchase lunch, preferably in some type of self-serve bar format. Fruits and vegetables should be in a form that is age-appropriate and easy to eat (i.e., oranges should be peeled and apples should be sliced for elementary-age children).

We believe these changes would go far in improving student health and would encourage smarter, healthier food choices. MCPS is usually on the forefront of student nutrition and we are certain headway on some or all of these fronts is already underway. It is important that the lines of communication stay open when discussing such issues. We look forward to hearing from you or your representatives at the joint Health and Human Services and Education committee meeting on March 20 and we appreciate the continued dialogue on this matter.

Best regards,



Craig Rice  
President, Montgomery County Council



George L. Leventhal  
Vice President, Montgomery County Council

### SUMMARY OF STUDIES ON FOOD DYES

Food dye	Allergic reactions	Carcinogenic contaminants	Tests for cancer*		Other**
			Mouse	Rat	
Blue 1	Yes		No <i>in utero</i> studies. One abstract (study not published) reported kidney tumors.	No tumors in the only good study.	Test tube study found inhibition of nerve-cell development.
Blue 2			Both studies were too brief and did not include <i>in utero</i> exposure.	Dosage was likely too low; possible brain and bladder tumors.	
Citrus Red 2 (used only on peels of some oranges at 2 ppm)			Bladder and other tumors	Bladder tumors	
Green 3			The only study did not include <i>in utero</i> exposure.	Possible bladder and other tumors	
Orange B (no longer used; in 1978 FDA proposed, but never finalized, a ban)			The only two studies did not include <i>in utero</i> exposure.	Toxic	
Red 3 (FDA has banned it from cosmetics, externally applied drugs, and lakes)			The only study did not include <i>in utero</i> exposure.	Thyroid tumors	
Red 40	Yes	<i>p</i> -Cresidine	Possible reticuloendothelial tumors of the immune system	No tumors in the only good study	
Yellow 5	Yes	Benzidine, 4-amino-biphenyl	Only mouse study was too brief, used too few mice, and began with 6-week-old mice.	No tumors in the only good study	6 of 11 studies showed genotoxicity. Hyperactivity in children.
Yellow 6	Yes	Benzidine, 4-amino-biphenyl	Neither study included <i>in utero</i> exposure.	Possible adrenal and testicular tumors.	

\* Tests should be done on both sexes of two rodent species, use sufficient numbers of animals, include *in utero* exposure, last at least two years after birth, and use maximally tolerated dosages. Ideally, tests would be conducted by independent labs, but most tests on dyes were conducted by industry.

\*\* In addition, numerous studies have found that mixtures of dyes cause hyperactivity and other behavioral impairments in children.

The colors on the front cover and the chapter headings are approximations. The exact color of dyes depends on concentration, pH, nature of the food, and other factors. Back cover photo (by Michael Jacobson, CSPI) of cupcakes with natural colorings made by D.D. Williamson Co.

## PROPOSED LIST OF BANNED ADDITIVES FOR MONTGOMERY COUNTY PUBLIC SCHOOL FOOD

The proposed Banned Additives list for MCPS includes additives for one or more of the following reasons:

- 1) Mainly used in unhealthy foods, and/or to substitute for nutritious ingredients. Our children need the best food possible to enable them to be ready to learn at school and to be their healthiest. Additives in this category frequently substitute for more nutritious ingredients, and/or are contained in foods that contain high levels of fat, sodium, or sugar. These ingredients are unnecessary, and our children deserve better.
  - a. **Artificial colors** frequently mask the absence of fruit or vegetables. They are used almost exclusively in foods of low nutritional value (candy, soda, gelatin desserts, etc.)
  - b. **Artificial flavorings** are cheap substitutes for fruit, vegetables, meat, or other real ingredients in order to provide flavor at lower cost.
  - c. **Bread/Flour additives azodicarbonamide and potassium bromate** are generally used in highly processed breads and baked goods to bleach and strengthen the dough. Whole grain breads and other foods are a healthier choice. Some bakers have switched to potassium iodate, but experts caution that it might well result in iodine levels that considerably exceed the normal daily requirement of iodine. Potassium iodate also has not been well tested. Azodicarbonamide and potassium bromate are not permitted in Europe or Australia. Many breads and flours not containing these additives can be found in the US marketplace.
  - d. **BVO (Brominated Vegetable Oil)** is used in citrus-flavored soft drinks such as Mountain Dew, Fanta Orange, and Gatorade as an emulsifier and clouding agent. There are far healthier beverage choices for our children.
  - e. **MSG (Monosodium Glutamate)** is a flavor enhancer that allows companies to reduce the amount of real ingredients in their foods, such as chicken in chicken soup. There are many other ingredients such as natural flavorings, Torula yeast, and hydrolyzed vegetable protein that also contain glutamate.
  - f. **Partially hydrogenated oils/Artificial trans fats** are used in high-fat foods such as cookies, french fries, doughnuts, fried chicken, icing, etc. Trans fat is the most harmful fat (on a gram-for-gram basis) in the food supply. Oils such as soy, corn, canola, safflower, and sunflower are healthier replacements for frying.
  - g. **Sodium nitrite/nitrate** is a preservative also used to color and flavor bacon, ham, hot dogs, luncheon meats, and corned beef. These products typically are high in salt and sometimes saturated fat.
  
- 2) Cause reactions in people sensitive to them. Some additives trigger an acute, allergic reaction, intolerance, or other problems in certain individuals. School is not the time to be learning which children react to those food additives.

- a. **Artificial colors** including Blue 1, Red 40, Yellow 5, Yellow 6, and carmine or cochineal extract have all been reported to cause allergic or hypersensitivity reactions in some people, including hives, asthma, and occasionally severe or life-threatening reactions. Yellow 5 causes allergy-like hypersensitivity reactions, primarily in aspirin-sensitive persons. In 1986 the Joint Council of Allergy and Immunology told the FDA that just listing Yellow 5 on the label was not protective enough because reactions could be life-threatening. Yellow 5 is the second most used dye in the United States. Yellow 6 may cause occasional, but sometimes severe, hypersensitivity reactions. Cochineal extract is a coloring obtained from the cochineal insect, which lives on cactus plants. Carmine is a more purified coloring made from cochineal. Carmine and cochineal used to be listed as “artificial coloring” or “color added,” but FDA now requires that they be clearly identified on food labels to help consumers identify the cause of their allergic reaction and avoid the colorings in the future.
  - b. **Aspartame** causes some people to get headaches or dizziness, according to individual reports. A few small studies have documented that finding.
  - c. **MSG** in large amounts has been shown in careful studies to cause reactions in some people, including headache, nausea, weakness, and a burning sensation on the back of the neck and forearms. Some people complain of wheezing, changes in heart rate, and difficulty breathing. Some people claim to be sensitive to very small amounts of MSG, although it is not known just how little MSG can cause a reaction.
  - d. **Mycoprotein (Quorn)** can cause vomiting, nausea, diarrhea, and, less often, hives and potentially fatal anaphylactic reactions. Many people have gone to emergency rooms for treatment of Quorn-related reactions. In 2013, an 11-year-old boy who had asthma died after eating a Quorn Turk’y Burger. The Center for Science has heard from more than 2,000 consumers in the U.S. and Europe reporting adverse reactions to Quorn, some of them quite severe. Some people react the first time they eat Quorn, while some react only after building up a sensitivity.
  - e. **Sulfites/SO<sub>2</sub>** are safe for non-sensitive people, but can cause severe reactions, especially in asthmatics.
- 3) Pose a risk of cancer or other adverse effect. Children, who consume more per pound of body weight than adults, whose bodies are still developing, and who have their whole lives ahead of them, are generally more susceptible than adults to adverse effects from chemical exposures. Furthermore, we believe that children are precious and deserve the highest level of protection. We note that as a general rule, the U.S. Food and Drug Administration (FDA) and other agencies generally consider that a chemical that causes cancer in animals should be considered a cancer risk to humans. In some cases, there is not a consensus on the level of risk posed by certain additives, but we believe there is enough evidence to warrant a “better safe than sorry” approach for the following additives.
- a. **Acesulfame-K** is an artificial sweetener that may cause cancer, and has not been adequately tested. Two rat studies suggest that the additive might cause cancer. In addition, large doses of acetoacetamide, a breakdown product, have been shown to affect the thyroid in rats, rabbits, and dogs. The safety tests on acesulfame K were conducted in the 1970s and were of mediocre quality.

- b. **Artificial colors** have been linked with behavioral problems, and some pose a small risk of cancer. In Europe, foods with any of six artificial colors – including Red 40, Yellow 5, and Yellow 6, which comprise over 90% of the artificial colors used in the US -- must contain a warning label, “may have an adverse effect on activity and attention in children.” FDA says “for certain susceptible children with ADHD and other problem behaviors, the data suggest that their condition may be exacerbated by exposure to a number of substances in food, including, but not limited to, artificial food colors.” In addition, FDA banned Red 3 from cosmetics and some drugs because it caused thyroid cancer in rats, but FDA's recommendation that it be banned in food was overruled by pressure from the cherry industry and the U.S. Department of Agriculture. (Red 3 used to color maraschino cherries, but it has been replaced there by Red 40, although is still used in other foods.) Caramel coloring, when produced with ammonia, contains the cancer-causing contaminants, 2-methylimidazole (2-MI) and 4-methylimidazole (4-MI). The State of California lists ammonia-caramel coloring as a carcinogen under the state's Proposition 65. The levels are highest in soda.
- c. **Aspartame** is an artificial sweetener that caused lymphomas, leukemias, kidney, and other cancers in rats and mice in three key studies funded by an independent lab (rather than by a maker of aspartame). In addition, aspartame causes headaches or other neurological symptoms in a small number of people.
- d. **Azodicarbonamide** is used to strengthen and bleach flour and bread dough, but has been poorly tested. Two suspicious chemicals form when bread with azodicarbonamide is baked. One, called urethane, is a recognized carcinogen. When azodicarbonamide is used at its maximum allowable level, it leads to slightly increased levels of urethane in bread that pose a small risk to humans.
- e. **BHA, BHT, Propyl gallate, and TBHQ** are antioxidants that retard rancidity in oils. They are frequently used in combination. All have health concerns, and can easily be avoided. BHA is listed in the official US government “Report on Carcinogens” as “reasonably anticipated to be a human carcinogen.” BHT caused cancer in some animal studies, although led to fewer cancers in other studies. Propyl gallate is suspected of being an endocrine disrupter and a carcinogen. It caused more cancers at a low dose than at a high dose in a government study of laboratory animals. TBHQ, chemically related to BHA, may also be a carcinogen; in one government study which used a better design than previous studies, it increased the incidence of tumors in rats. These synthetic chemicals can be replaced by safer chemicals (e.g., vitamin E), safer processes (e.g., packing foods under nitrogen instead of air), or can simply be left out
- f. **BVO (Brominated Vegetable Oil)** was removed from FDA’s “Generally Recognized as Safe” list of food ingredients in 1970, and FDA permitted its use only an “interim” basis pending additional study—one of only four such interim-allowed additives. Decades later, BVO is still poorly tested and remains on the interim list. BVO leaves residues in body fat and the fat in brain, liver, and other organs. Animal studies indicate that BVO is transferred from mother's milk to the nursing infant and also can cause heart lesions, fatty changes in the liver, and impaired growth and behavioral development. BVO is not permitted in Europe.

- g. **Caffeine** is “a central nervous system stimulant,” according to FDA, who also says “Some studies show that caffeine causes a physical dependence or addiction.” The Institute of Medicine recommended that school foods and beverages be caffeine free, with the exception of trace amounts of naturally occurring caffeine-related substances. Several expert bodies advise against caffeinated drinks for children, including the American Academy of Pediatrics. Several states do not allow caffeinated beverages in schools, including California, Connecticut, Hawaii, Massachusetts, New Mexico, Rhode Island, Vermont, and some localities in Utah.
- h. **Partially hydrogenated oils/Artificial trans fats** are a potent cause of heart disease. Trans fat consumption should be kept as low as possible, according to the U.S. Dietary Guidelines. Gram-for-gram, trans fat is the most harmful fat of all. At the time of peak artificial trans fat use, Harvard epidemiologists published research in the New England Journal of Medicine estimating that trans fat was responsible for between 72,000 and 228,000 coronary heart disease events per year. Harvard’s Walter Willett, chair of the nutrition department, estimated that trans fat was causing upwards of 50,000 deaths annually. Reflecting the decreased use of trans fat, the Centers for Disease Control and Prevention estimated that artificial trans fat was causing as many as 10,000 to 20,000 heart attacks and 3,000 to 7,000 deaths annually.
- i. **Potassium bromate** is used in white bread and rolls, and mostly breaks down to form innocuous bromide. However, bromate itself causes cancer in animals. Bromate has been banned virtually worldwide except in Japan and the United States. It is rarely used in California because a cancer warning might be required on the label. Numerous millers and bakers have stopped using bromate.
- j. **Saccharin** is an artificial sweetener that caused cancer of the bladder, uterus, ovaries, and other organs in animal studies. Human studies have been inconsistent, but some found an association with higher cancer risk. In 1977, the Food and Drug Administration proposed banning saccharin, but Congress intervened and permitted its use with a warning notice. Congress killed the warning-notice requirement in 2000.
- k. **Sodium nitrite/nitrate** can lead to the formation of small amounts of potent cancer-causing chemicals (nitrosamines), particularly in fried bacon. Companies now add ascorbic acid or erythorbic acid to bacon to inhibit nitrosamine formation, a measure that has greatly reduced but not eliminated the problem. Several studies link consumption of cured meat and nitrite by children, pregnant women, and adults with various types of cancer. Hot dogs and other cured meats that say “no added nitrite” are often made with celery powder or juice which are naturally high in nitrite, and no better.
- l. **Sucralose** is an artificial sweetener that caused leukemia in mice according to the same independent laboratory that tested aspartame. The results from this study have not yet been published.

## Proposed List

1. Artificial Colors
2. Artificial Flavorings
3. Artificial Sweeteners
  - a. Aspartame
  - b. Acesulfame-K
  - c. Saccharin
  - d. Sucralose
4. Bread/Flour Additives
  - a. Azodicarbonamide
  - b. Potassium Bromate
5. Brominated Vegetable Oil (BVO)
6. Caffeine
7. MSG (Monosodium Glutamate)
8. Mycoprotein (Quorn)
9. Partially Hydrogenated Oils/Trans Fats
10. Preservatives
  - a. Butylated Hydroxyanisole (BHA)/Butylated Hydroxytoluene (BHT)
  - b. Propyl Gallate
  - c. TBHQ
11. Sodium Nitrate/Sodium Nitrite
12. Sulfur Dioxide & Sodium Sulfite

## Sources

Center for Science in the Public Interest. *Chemical Cuisine*.  
<http://cspinet.org/reports/chemcuisine.htm>

Center for Science in the Public Interest. *Food Dyes: A Rainbow of Risks*. 2010.  
<http://cspinet.org/new/pdf/food-dyes-rainbow-of-risks.pdf>

Lefferts, Lisa Y., Senior Scientist, Center for Science in the Public Interest. "What's Real and Nutritious Food: What About Food Additives?" Power point presentation, Read Food for Kids Montgomery conference, 2013.

Lefferts, Lisa Y., Senior Scientist, Center for Science in the Public Interest. Personal communication, 2014.

### CHEMICAL ADDITIVES IN MCPS FOOD ITEMS

ITEM	GROUP	ARTIFICIAL COLOR	ARTIFICIAL FLAVOR	AZODI-CARBON-AMIDE	BHA/BHT/TBHQ	HFCS	MSG etc.	SODIUM NITRATE/NITRITE	TRANS FATS
CINNAMON WG ROLL	B'FAST			Y					
SAUSAGE PATTY	B'FAST	Y							
PANCAKES, WG MINI	ENTREES	Y	Y						
PB JAMWICH	ENTREES					Y			Y
PBJ POCKET	ENTREES			Y		Y			Y
PIZZA, FR BREAD W/ PEPP	ENTREES			Y					
PIZZA, FR BREAD WG	ENTREES			Y					
TURKEY CARNITAS	ENTREES	Y							
SORBET, BLUE RASPBERRY	FRUIT	Y	Y						
CEREAL OATMEAL WG MAPLE	GRAINS	Y	Y						
FRENCH TOAST STICKS	GRAINS		Y			Y			
ROLL, WG SUB	GRAINS			Y					
HP CHIC NUGGETS /FRUIT BREAD	HP	Y	Y				Y		
HP CHIC NUGGETS /TATER TOTS	HP	Y	Y				Y		
HP CHIC PATTY / TATER TOTS	HP						Y		
HP CHIC PATTY SPICY	HP						Y		
HP CHIC PATTY SPICY/SWT POT	HP						Y		
HP CHIC PATTY SPICY/TATERTOTS	HP						Y		
HP HAMBURGER / CARROTS	HP	Y							
HP HAMBURGER / SEAS POT	HP	Y							
HP HAMBURGER / TATER TOTS	HP	Y							
HP TURKEY FRANK/ TATER TOTS	HP							Y	
MILK CHOC FF	MILK					Y			
CHEETOS BK CR CH	SNACKS	Y	Y				Y		
COOKIE BENEFIT CH CHIP	SNACKS		Y		Y				Y
COOKIE BENEFIT DBL CHOC	SNACKS		Y		Y				Y
COOKIE BENEFIT OAT RAISIN	SNACKS				Y				Y
COOKIE BENEFIT SUGAR	SNACKS		Y		Y				Y
COOKIE CANDY	SNACKS	Y	Y		Y				Y
CRACKERS,CHEESZ IT WG	SNACKS				Y				
DORITOS SPICY SW CH	SNACKS		Y				Y		
DORITOS, COOL RANCH RF	SNACKS	Y	Y				Y		
WELCH'S FRUIT SNACKS	SNACKS	Y	Y						
GRANOLA BAR,WG COCOA	SNACKS		Y		Y	Y			
ICE CREAM CHOC SHORTCAKE	SNACKS	Y	Y			Y			Y
ICE CREAM COOKIE CONE	SNACKS	Y	Y						
ICE CREAM COTTON CDY PU	SNACKS	Y	Y			Y			
ICE CREAM ORANGE POLE	SNACKS	Y	Y						
ICE CREAM SOUR CHERRY	SNACKS	Y	Y						
ICE CREAM RAINBOW POLE	SNACKS	Y	Y						
ICE CREAM STRAW SHORTCAKE	SNACKS	Y	Y		Y				Y
ICE CREAM VAN CHOC CONE	SNACKS	Y	Y						
ICE CREAM VAN FUDGE PU	SNACKS		Y			Y			
ICE CREAM VANILLA SANDW	SNACKS	Y	Y			Y			
RICE KRISPIE TREATS	SNACKS		Y		Y				
SIDEKICKS 100% FRT JC	SNACKS	Y	Y						
POTATO FRENCH FRY	VEG								Y
POTATO, MASHED (S)	VEG	Y	Y						Y
POTATO, TATER TOT	VEG								Y

**SUGAR CONTENT IN MCPS FOOD ITEMS  
(grams)**

<b>ITEMS W/ ADDED SUGARS</b>	<b>GROUP</b>	<b>TOTAL SUGARS</b>	<b>NATURAL SUGARS</b>	<b>ADDED SUGARS</b>
BREAKFAST WG WRAP	BREAKFAST	1	0	1
CINNAMON WG ROLL	BREAKFAST	12	0	12
MANDARIN CHICKEN/WG RICE	ENTREES	7	0	7
MORNINGSTAR CHIK NUGGETS	ENTREES	2	0	2
PANCAKES, WG MINI	ENTREES	10	0	10
PB JAMWICH	ENTREES	25	0	25
PBJ POCKET	ENTREES	24	0	24
PIZZA, FR BREAD WG	ENTREES	5	0	5
SPICY WG CHIC B'LESS WINGS	ENTREES	1	0	1
TURKEY CARNITAS	ENTREES	3	0	3
YOGURT, 4OZ. ASST'D	ENTREES	14	8	6
YOGURT, 8OZ. ASST'D, LOWFAT	ENTREES	37	16	21
YOGURT, 8OZ. ASST'D, NONFAT	ENTREES	32	16	16
CEREAL OATMEAL WG MAPLE	GRAINS	12	0	12
CEREAL, CORN FLAKES	GRAINS	2	0	2
CEREAL, RICE KRISPIES WG	GRAINS	2	0	2
CEREAL, KASHI TOASTED HONEY	GRAINS	5	0	5
FRENCH TOAST 4 WG	GRAINS	7	0	7
MILK CHOC FF	MILK	21	12	9
DORITOS,SPICY SW CH	SNACKS	1	0	1
DORITOS,COOL RANCH	SNACKS	1	0	1
COOKIE BENEFIT CH CHIP	SNACKS	9	0	9
COOKIE BENEFIT DBL CHOC	SNACKS	11	0	11
COOKIE BENEFIT OAT RAISIN	SNACKS	8	0	8
COOKIE BENEFIT SUGAR	SNACKS	8	0	8
WELCH'S FRUIT SNACKS	SNACKS	11	0	11
GRANOLA BAR,WG COCOA	SNACKS	10	0	10
ICE CREAM COOKIE CONE	SNACKS	15	0	15
ICE CREAM ORANGE POLE	SNACKS	12	0	12
ICE CREAM SOUR CHERRY	SNACKS	26	0	26
ICE CREAM VAN CHOC CONE	SNACKS	14	0	14
ICE CREAM CHOC SHORTCAKE	SNACKS	14	0	14
ICE CREAM COTTON CDY PU	SNACKS	13	0	13
ICE CREAM FUDGE FRENZY	SNACKS	7	0	7
ICE CREAM RAINBOW POLE	SNACKS	12	0	12
ICE CREAM STRAW SHORTCAKE	SNACKS	16	0	16
ICE CREAM VAN FUDGE PU	SNACKS	14	0	14
ICE CREAM VANILLA SANDWICH	SNACKS	15	0	15
RICE KRISPIE TREATS	SNACKS	15	0	15
<b>ITEMS W/ NATURALLY OCCURRING SUGARS ONLY</b>	<b>GROUP</b>	<b>TOTAL SUGARS</b>	<b>NATURAL SUGARS</b>	<b>ADDED SUGARS</b>
JUICE FRUIT 66 MIX BERRY	SNACKS	28	28	0
JUICE V8 FUSION	SNACKS	31	31	0
SIDEKICKS 100% FRT JC	SNACKS	19	19	0
SORBET, ASST	FRUIT	14	14	0
MILK SKIM	MILK	12	12	0
MILK WHITE 1%	MILK	12	12	0
<b>ITEMS W/ NUTRITIONAL INFORMATION NOT AVAILABLE</b>	<b>GROUP</b>	<b>TOTAL SUGARS</b>	<b>NATURAL SUGARS</b>	<b>ADDED SUGARS</b>
SMOOTHIE,100 % FRT BL RASP	SNACKS			
SMOOTHIE,100 % FRT SR APPLE	SNACKS			
ICE CREAM CHOC RIPPLE CUP	SNACKS			
ICE CREAM COTTON CDY CUP	SNACKS			
ICE CREAM VAN/CHOC CUP	SNACKS			
ICE CREAM VANILLA CUP	SNACKS			
ICE CREAM STRAW RIPPLE CUP	SNACKS			
JUICE, FRUIT PUNCH 8 OZ.	SNACKS			
JUICE FRUIT 66 TR PUNCH	SNACKS			
JUICE, 100 % FRUIT SWITCH	SNACKS			
COOKIE BENEFIT SW BIT	SNACKS			



**MONTGOMERY COUNTY PUBLIC SCHOOLS**  
www.montgomeryschoolsmd.org  
MARYLAND

March 14, 2014



The Honorable Craig Rice, President  
The Honorable George L. Leventhal, Vice President  
Montgomery County Council  
100 Maryland Avenue  
Rockville, Maryland 20850

Dear Mr. Rice and Mr. Leventhal:

Thank you for your letter of March 10, 2014, in which you share recommendations for changes in the school meals program proposed by Real Food for Kids–Montgomery. I understand that these recommendations will be discussed during the Montgomery County Council Joint Health and Human Services and Education committee session scheduled for Thursday, March 20, 2014. Board members Shirley Brandman and Patricia O’Neill; Mrs. Marla R. Caplon, director, Division of Food and Nutrition Services (DFNS); and I will be present to participate in the session.

The members of the Board of Education and I are committed to a comprehensive approach that supports a healthy school environment and to improving programs that address the latest health and nutrition findings. We have been consistently focused on creating and implementing initiatives for the health and well-being of our students. The Board of Education is scheduled to discuss the school meals program at the June 3, 2014, Board meeting and would invite you to attend this meeting. We will review the recommendations of Real Foods for Kids–Montgomery as part of this discussion. This discussion also will include the cost of making any changes to the school meals program. As you know, DFNS is a self-supporting enterprise fund. We already have added substantial costs to the program to improve the quality of the meals that we serve, including \$516,000 for the inclusion of whole grains in our meals, and \$560,000 for expanding the availability of fruits and vegetables. The Board of Education has to consider the costs of any recommended changes to the program.

Dietary habits that contribute to students’ learning, achievement, and lifelong health are influenced at school. Nutrition education equips students with the knowledge and skills that provide a foundation for healthy nutrition. Our school meals program is nationally known for its foresight and for being an integral part of the students’ school day.

MCPS’ responses to the recommendations of Real Food for Kids–Montgomery are enclosed. I look forward to seeing you on March 20.

Sincerely,

Joshua P. Starr, Ed.D.  
Superintendent of Schools

JPS:lsh  
Enclosure  
Copy to:

- |  |                 |             |
|--|-----------------|-------------|
| Members of the Montgomery County Council | Executive Staff | Mrs. Lazor  |
| Members of the Board of Education        | Mrs. Caplon     | Mr. Ikheloa |

Office of the Superintendent of Schools

## Montgomery County Public Schools Responses to Real Food for Kids—Montgomery Recommendations

### Recommendation 1

**Wellness Committee.** The MCPS Wellness Committee should be re-formed and should include all major stakeholders, including representatives from local community and non-profit organizations that work on issues related to school wellness. The committee should be composed at minimum of 50% parents, selected through an unbiased application process with representation from each cluster and meet at least quarterly. The staff member charged with operational oversight over the formation and implementation of the wellness policy and committee should neither be subordinate to nor an employee of any department or employee responsible for implementation of the policy. The committee should be chaired by a member of the Board of Education.

### Response

Board of Education Policy JPG, *Wellness: Physical and Nutritional Health*, and MCPS Regulation JPG-RA, *Wellness: Physical and Nutritional Health*, have been in place since 2006. Regulation JPG-RA was revised in March 2012. Wellness policies throughout the state of Maryland are being reviewed currently by the Maryland State Department of Education in conjunction with the University of Maryland to assess the comprehensiveness and status of implementation. This is the second review conducted since 2006.

The United States Department of Agriculture (USDA) is in the process of publishing final regulations on the requirements included in the *Healthy Hunger-Free Kids Act of 2010*. The Division of Food and Nutrition Services (DFNS) is expecting final language on the Smart Snack regulations soon. USDA just published a proposed regulation, Local School Wellness, on February 26, 2014, that provides regulatory language specific to the writing, implementation, and enforcement of wellness policies. The rule specifies wellness policy leadership and public engagement in the development, and implementation and evaluation of wellness policy activities. Public comments to the proposed rule are due by April 28, 2014.

Montgomery County Public Schools (MCPS) has plans to reconvene a Wellness Committee, and Policy BFA, *Policysetting*, will be followed in reconvening this committee. Based on the final language of the USDA regulations, the committee will include a variety of stakeholders and have representation from our student and parent community.

### Recommendation 2

**Free, Unlimited Water.** MCPS should implement a system-wide solution for easier access to free, unlimited water in cafeterias (involving something to drink it with other than multiple trips to the water fountain).

### Response

Section 203 of the *Richard B. Russell National School Lunch Act* requires that schools participating in the National School Lunch Program make potable water available to children at no charge in the

place where meals are served during the meal service. Availability of drinking water currently is a practice that is to be followed at all MCPS schools. Students are able to access water in drinking fountains, and if drinking fountains are not available, students are provided with cups and water containers in the dining area. The Department of Facilities Management reports that all water fountains in areas adjacent to or in the cafeteria are approved for safe drinking.

### **Recommendation 3**

**Scratch-Cooked Food.** MCPS should immediately begin the process of moving from processed, pre-plated and reheated food to food cooked from scratch at the central facility with more prep work done on site at schools with kitchens. At least one meal per day should be offered that is not a typical “junk food” (i.e., not chicken nuggets, pizza, hot dogs, burgers, fries) with an eye toward drastically reducing these options to no more than once or twice a month.

### **Response**

Menus planned and meals served by DFNS exceed the USDA guidelines and are intended to provide a variety of menu items that are acceptable to a diverse student population. Choices on the menus must be appealing to students and also must be affordable. The Central Production Facility was built in 1995 and was designed to provide nutritious meals with standardized quality meeting stringent food safety standards, while controlling labor costs. Centralizing the food preparation provides cost avoidance in utilities, space, equipment, and services associated with operating fully functioning kitchens in schools. Many items prepared in the Central Production Facility are from scratch, including entrée salads, soups, salad dressings, casseroles, several entrée items, and baked poultry items.

The terminology of “junk food” used by the Real Food for Kids–Montgomery is subjective. There is a misconception that food items served in schools are the same as what would be found in a commercial restaurant. MCPS has specific standards for food items that limit the fat and sodium content. For example, pizza served in MCPS has a whole grain crust and is low in sodium and fat. Hot dogs, served on a whole grain bun, are a turkey product to reduce the fat content. Hamburgers are low in fat and sodium and are served on whole grain buns. Chicken nuggets have a whole grain breading and are baked, not fried. The DFNS production facility that currently is under construction is planned to reduce the use of commercially prepared menu items. There is expanded space and equipment for preparation and packaging of fresh fruits and vegetables, as well as the required space to safely handle and prepare fresh meats and poultry. School kitchens do not have the capacity in preparation space and equipment or in storage space and equipment to fully prepare menu items “from scratch.” Additionally, the labor and food costs in such an operation are prohibitive and could not be recovered in the price of the meal, as expected in the enterprise operation.

Obtaining customer feedback is very important to the success of the program. Focus group meetings are conducted with students to obtain feedback on various menu offerings. New menu items are tested with students to determine acceptability. DFNS staff attends school staff meetings and Parent Teacher Association meetings to discuss menu options and provides nutritional information and sample menu items.

#### Recommendation 4

**Dangerous Chemical Additives.** MCPS should remove all chemicals listed as “caution” or “avoid” by the Center for Science in the Public Interest from all food served in MCPS.

#### Response

All foods and beverages available to MCPS students follow the regulations for food additives as specified by the Food and Drug Administration. The specifications for foods and beverages purchased limit food additives and colorings when appropriate. DFNS staff continually collaborates with food manufactures to expand the availability of products limiting additives when possible.

#### Recommendation 5

**Sugar.** MCPS should set an upper limit for sugar in any product served in MCPS based on limits for children recommended by the American Heart Association.

#### Response

Sugar is a natural ingredient found in many food items. Sugar is limited in the recipes for food items prepared at the Central Production Facility. Non-sweetened cereals are purchased and sugar packets are not available to students. However, a syrup packet containing one tablespoon of syrup is provided to students when whole grain pancakes and whole grain French toast is on the menu. Sugar content of foods served outside of the school meals program is compliant with MCPS Regulation JPG-RA, *Wellness: Physical and Nutritional Health*, which states “Sugar: Total sugar must be under or equal to 35 percent by weight (includes naturally occurring and added sugars). Excludes naturally occurring sugars in fruits, vegetables and milk.”

MCPS limits the sugar content in foods and beverages sold to students throughout the school day and is in compliance with the recommendations of the American Heart Association. The following information is from the American Heart Association:

- Naturally occurring sugars and added sugars
  - There are two types of sugars in American diets: naturally occurring sugars and added sugars.
    - Naturally occurring sugars are found *naturally* in foods such as fruit (fructose) and milk (lactose).
    - Added sugars include *any* sugars or caloric sweeteners that are *added* to foods or beverages during processing or preparation (such as putting sugar in your coffee or adding sugar to your cereal). Added sugars (or added sweeteners) can include natural sugars such as white sugar, brown sugar, honey, as well as other caloric sweeteners that are chemically manufactured (such as high fructose corn syrup).
- You can use sugars to help enhance your diet. Adding a limited amount of sugar to improve the taste of foods (especially for children) that provide important nutrients, such as whole-grain cereal, low-fat milk or yogurt, is better than eating nutrient-poor, highly sweetened foods.

- A person's discretionary calorie budget varies depending on how physically active they are and how many calories they need to consume to meet their daily nutrient requirements. The American Heart Association recommends that no more than half of a person's daily discretionary calorie allowance be spent on added sugars.

### **Recommendation 6**

**Vending and A La Carte (Snack) Offerings.** MCPS should replace items on current vending and a la carte list of foods and beverages with healthier choices (i.e., items without artificial colors and flavors, low in sugar, high in fiber).

### **Response**

Foods and beverages available in vending machines and a la carte choices in school cafeterias are compliant with MCPS Regulation JPG-RA, *Wellness: Physical and Nutritional Health*. Guidelines provided in the regulation include portion size, calories, percent calories from sugar, and fat and sodium content. Purchases from vending machines containing foods and beverages that are not in compliance with the regulation are not available until 30 minutes after the end of the school day. The language in the USDA Smart Snack Regulation, yet to be finalized, is the first time in history that USDA has created guidance for foods and beverages sold outside of the school meals program. The proposed regulations mirror practices that have been followed in MCPS since 2006 with the exception of one item: The availability of noncompliant foods and beverages not be made available until 30 minutes after the end of the school day. Although this is not a requirement until school year 2014–2015, MCPS implemented this change at the start of the current school year, a year earlier than required.

### **Recommendation 7**

**Transparency and Communication.** All items sold and served to children in any school in MCPS' cafeterias or snack carts or shops should appear on the monthly menus. In addition, at the beginning of each school year, each school should send parents a list of a la carte items sold at that school with information on how to block children's lunch accounts to prevent a la carte purchases.

### **Response**

DFNS strives to meet the nutritional needs of all students. In elementary schools, there are two entrée choices daily. In an effort to accommodate students who prefer not to eat meat, a third meatless option is offered each day. Additionally, a vegan option is offered daily. The published menu informs parents that alternative items are available and the school cafeteria manager should be contacted for specifics.

The published menu informs parents that a la carte items are available for purchase and recommends that the school be contacted for specific items available at their child's school. Parents also are informed that their student's account may be blocked, which would prohibit their student from purchasing a la carte items. A large variety of a la carte items are available to schools to choose from when deciding what items will be sold, the frequency, and the grade levels of the children eligible to purchase the a la carte items. Determination of what items are available at each school is made by various stakeholders, including wellness committees, school administration, student groups, etc. The

variance of products available at each school makes it impossible to provide a school-specific list on the menu or the DFNS website. Many schools currently send information regarding a la carte choices home with students via backpack distribution or list them in the school newsletter. Parents are able to access nutrient and allergen information on the DFNS website for all foods and beverages available through the school cafeteria. The DFNS website may be accessed at the following link:

[www.montgomeryschoolsmd.org/departments/foodserv](http://www.montgomeryschoolsmd.org/departments/foodserv)

In addition, should a student require a special diet for allergy and/or medical needs, registered dietitians on staff with DFNS will meet with the student, staff, teacher, and others involved to develop an appropriate meal plan.

### **Recommendation 8**

**Unlimited Fruits, Vegetables or Salad Bars.** MCPS should offer unlimited fruits and vegetables free to all children who purchase lunch, preferably in some type of self-serve bar format. Fruits and vegetables should be in form that is age-appropriate and easy to eat (i.e., oranges should be peeled and apples should be sliced for elementary-age children).

### **Response**

Salad bars, as part of the lunch meal, are available in many schools, including elementary schools. All school serving lines offer a variety of fresh fruits and vegetables each day as part of the lunch meal and students are encouraged to select fruits and vegetables as part of their meal. As a way to help educate students on the importance of fruits and vegetables, colorful line signage identifies fruits and vegetables on the serving lines. Apple slices are packaged, baby carrot sticks are offered, green peppers and cucumbers are presliced, and cherry tomatoes are served, making it easy for even the youngest of students to enjoy.

*The Healthy Hunger-Free Kids Act of 2010* stipulates that meals must have a minimum and maximum number of calories. Permitting students to take unlimited quantities of fruits and vegetables would put us out of compliance for the caloric requirements and does not support the importance of a balanced meal with appropriate serving sizes.